

RCRA COMPLIANCE EVALUATION INSEPCTION REPORT

WESTATES CARBON - ARIZONA INCORPORATED

EPA ID NO: AZD982441263

Date of Inspection: September 19, 1995

Location: 2523 Mutahar Street
Parker, AZ 85344

EPA Inspectors: Clinton Seiter
Environmental Protection Specialist
(415) 744-2141

Dennis Geiser
Environmental Scientist
(415) 744-2147

Site Representatives: Monte McCue, Plant Manager
Mark Sandoval, Environmental Health and
Safety Manager
(520) 669-5758

Report Prepared By: Clinton Seiter

INTRODUCTION

On September 19, 1995, Dennis Geiser and Clinton Seiter, representing the U.S. Environmental Protection Agency (EPA), conducted an unannounced Compliance Evaluation Inspection (CEI) at Westates Carbon-Arizona Incorporated, located at 2523 Mutahar Street, (P.O. Box E) in Parker, Arizona (EPA I.D. No. AZD982441263) on land owned by the Colorado River Indian Tribes (CRIT). Westates is a carbon regeneration facility owned by the Wheelabrator Technologies Company. The facility receives approximately 300,000 pounds of wastes per month, 70% of which are RCRA regulated. Currently, twenty-one people are employed there. The purpose of the inspection was to evaluate the facility's compliance with the interim status requirements of their Part A Permit Application and the RCRA Hazardous Waste Regulations. Photographs were taken to document the inspection and are included as Attachment 2 of this report.

In preparation for this CEI, the previous U.S. Environmental Protection Agency-Region IX (EPA) CEI and the revised Part A Permit Application dated December 17, 1993, were reviewed.

Present for the CEI were Mr. Geiser and Mr. Seiter, Monte McCue, Westates' Plant Manager, and Mark Sandoval, Westates' Environmental Health and Safety Manager. Bonita Fernandez, a representative of CRIT, was also present during the inbriefing and outbriefing, but did not accompany the inspectors during the facility inspection.

PERMIT STATUS

In May of 1989, Westates approached the CRIT with a request to build a carbon reactivation facility in the CRIT Industrial Park in Parker, Arizona. On July 14, 1990, the CRIT approved the request for the land lease and facility construction on tribal lands. The Agreement between Westates and the CRIT was then submitted to the U.S. Department of the Interior, Bureau of Indian Affairs for final approval. Following an Environmental Assessment for the Westates project, final approval was granted and a Land Lease Agreement was signed, effective April 1, 1991.

On or about April 1, 1991, Westates filed a Notification of Hazardous Waste Activity with U.S. Environmental Protection Agency, Region IX. Westates was issued an EPA Identification Number (AZD982441263) on May 6, 1991 for the treatment, storage, or disposal of various listed and characteristic wastes.

Effective August 21, 1991, the final rule on the burning of hazardous waste in boilers and industrial furnaces (BIF) including the regulation of carbon regeneration units was addressed by EPA. EPA clarified that carbon regeneration units

are thermal treatment units, subject to RCRA permitting requirements. August 21, 1991, the effective date of the BIF rule, was established as the deadline for submittal of Part A Permit Applications.

Westates qualifies for interim status as an existing facility, having submitted a Part A Permit Application prior to August 21, 1991, per 56 FR 7186, Part Three, VIII, A, (1). Westates also qualifies as an existing facility having met the requirements detailed in 40 CFR, Part 266.103(a)(1)(ii) for facilities under construction.

On or about August 12, 1991, Westates submitted a Part A Permit Application to EPA. A revised Part A Permit Application was submitted on September 4, 1992. This revision was returned to Westates for revisions. The revised Part A was submitted on or about November 30, 1992.

The most recent revised Part A Permit Application, dated December 17, 1993, was submitted to reflect current facility operations and to clarify certain information submitted in the original Part A Application. The revised Part A identifies the following units in operation at Westates:

- S01 (storage in containers). This represents the Container Storage Area, which is one unit. The unit capacity is 100,000 gallons.
- S02 (storage in tanks). This represents 5 units, Tanks T-1 (8,319 gallons), T-2 (8,319 gallons), T-5 (8,319 gallons), T-6 (8,319 gallons), and T-8 (905) gallons. All of these units are Process Feed Tanks; Tank T-8 is the Furnace Feed Tank.
- T04 (other treatment). This represents the Carbon Regeneration Units (CRU) 1 and 2. CRU-1 is currently operational. The capacity is listed as 1,200 lbs/hr. CRU-2 has not been constructed to date.
- Tank listings in the original Part A have been deleted on the revised (12/17/93) Part A to accurately reflect the process codes for the T04 Tanks. A clarification of this can be found on Page 2 of the revised Part A, included as Attachment 4. This represents Tanks T-9, Recycle Water Storage Tank, used to transfer spent carbon. The capacity listed for this unit is 45,000 gallons. Tank T-12 (T04) is a Rainwater Collection Tank with a capacity of 35,000 gallons, and collects rainwater run-off from the warehouse roof and outdoor driveways. (this water is then used as makeup water for Tank T-9.
- T04 (other treatment). Tank T-11 is the Industrial Sewer Water Surge Tank, which has a capacity of 35,000 gallons, and collects scrubber blowdown water for blending prior to

— discharge to the municipal sewer system.

The Part B Permit Application was submitted by the facility on January 17, 1995.

SUMMARY OF PREVIOUS COMPLIANCE EVALUATION INSPECTION

On March 9, 1995, EPA conducted a RCRA CEI at Westates. With the exception of two Class II violations, the facility was found to be handling its hazardous wastes satisfactorily. The potential violations from the May 31, 1995 Compliance Evaluation Inspection Report included the following:

- 40 CFR 265.25 - Failure to submit to EPA the 1993 RCRA Biennial Hazardous Waste Report in a timely manner.
- 40 CFR 262.41(a)(7) - Failure to accurately report the quantity or change from previous generation quantities of RCRA hazardous waste generated in 1993.

The facility has since come into compliance with these violations. Return to Compliance letter was issued by EPA.

INVESTIGATION

On September 19, 1995, around 8:30 a.m., the inspectors arrived at the facility, provided introductions and credentials to Westates, and contacted Mr. Monte McCue, the plant manager. On the day of the inspection, the weather was clear and sunny, with the temperature in the low 90s. The EPA inspectors explained that this was a semi-annual offsite review inspection, and that its focus would be on any changes that may have taken place in the facility during the last six months.

During the inbriefing, Mr. McCue stated that the facility would be expanded to include a new reactivation furnace with an exterior afterburner. The old furnace will then be shut down until the Part B is issued.

EPA inspectors also asked Mr. McCue about the reactivated carbon "fines" which are byproducts of the carbon regeneration process. The report for the EPA inspection dated 3-15-94 mentioned that drums of these fines (which are considered hazardous per the "derived-from" rule) were being stored at the facility until a market could be found for them. Mr McCue stated that a commercial application for the fines had been created and the fines had been transported offsite as product.

Mr. McCue escorted the inspectors during all aspects of the inspection.

SITE INSPECTION (Attachment 1 - Site Plan)

Covered Container Storage Area

The container storage area is used to store RCRA regulated

hazardous spent carbon waste in drums and to store non-hazardous reactivated carbon product. The specific hazardous waste and product areas are clearly and physically separated. The hazardous waste storage side has a sump system that collects any spills or wash waters which then are pumped into the treatment process. The health lab sample storage area is located in the southwest corner of the container storage area. (See photos #1 and #2). These are health risk assessment samples taken periodically from the dewatering screw. They are later assessed for the presence of 13 different metals. **No violations found.**

Concrete Containment Pad

This concrete pad (44'x139'x4") is located on the northwest end of the Covered Container Storage Area. It is used for the loading and off-loading of RCRA Hazardous Waste on/from trucks. Spent carbon drums are off-loaded here and moved directly into the **Covered Container Storage Area**. Additionally, the pad holds a bin for less than 90-day storage of hazardous waste debris generated on-site, such as contaminated rags, contaminated spill cleanup materials, Tyvek, booties, gloves, contaminated wooden pallets, etc. (see photo #3). This bin is transported off-site at least every 90 days for disposal. **No violations found.**

Outer Yard

The outer yard adjacent to the back fence (northeast) line is used to store triple rinsed spent carbon containers. No hazardous waste activity was indicated in the areas outside of the loading, storage, and process areas. **No violations found.**

DOCUMENT REVIEW

The document review focussed on the previous six month period (any period prior to this had been covered by the March 9, 1995 CEI).

Job descriptions

Job descriptions provide adequate descriptions of the responsibilities of each job. **No violations found.**

Daily Inspection Log

The daily inspection log was reviewed from 7-1-95 through 9-18-95. Whenever something was noted as unsatisfactory, the log showed a prompt response to correct it. **No violations found.**

Weekly Inspection Log

The weekly inspection log was reviewed from 1-3-95 through 9-12-95. All records appeared complete with no deficiencies. **No violations found.**

Manifests and Land Disposal Restrictions

All manifests and land disposal restriction notification (LDR) forms inspected appeared correct with no deficiencies noted. **No violations found.**

Training Records

All training records reviewed were complete and up-to-date. **No violations found.**

Contingency Plan

No changes were made since the May 9, 1995 inspections. According to the facility, they will update the plan to list Mr. Sandoval as the new Emergency Coordinator. **No violations found.**

Facility Closure Plan

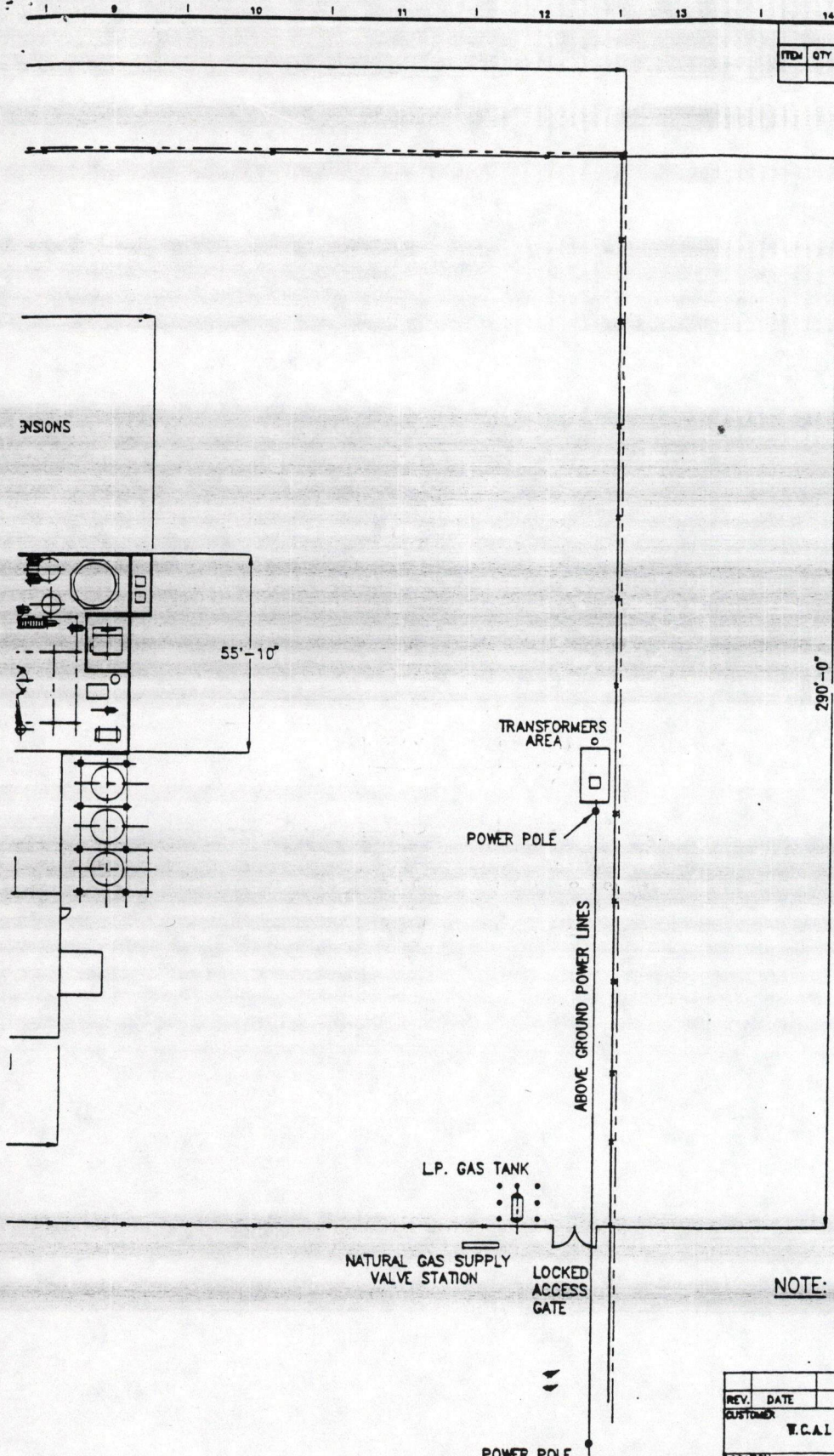
The facility's Closure Plan was reviewed, and it was noted that the closure cost estimated was updated effective 6-1-95 by 2.7%, in keeping with regulatory requirements. **No violations found.**

POTENTIAL VIOLATIONS

No potential violations were noted.


Clinton T. Seiter
Compliance and Enforcement Officer

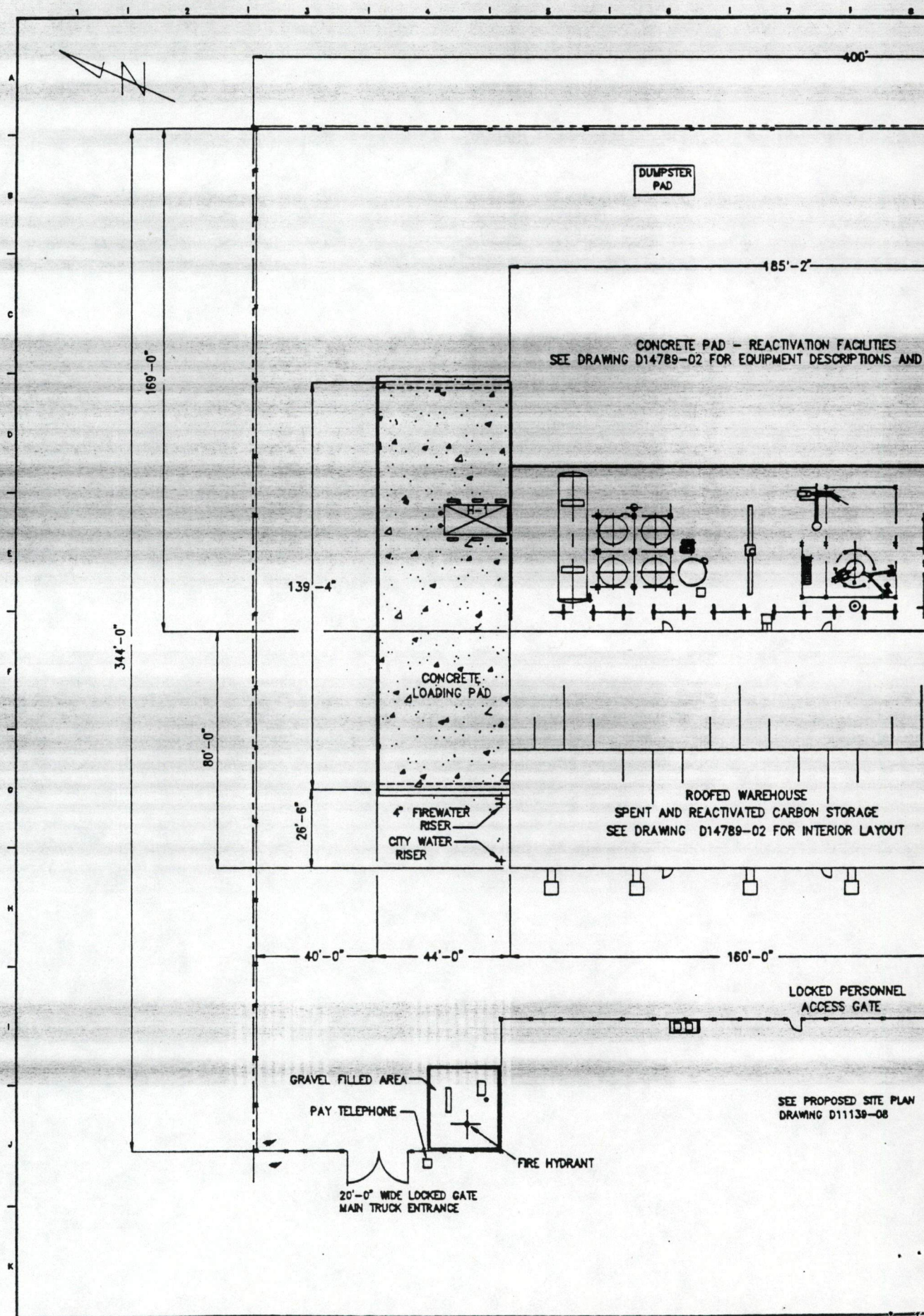
Attachment I



| LIST OF COMPONENTS | | | | DWG. # | DATE |
|--------------------|-----|---------------|-------------|--------|------|
| ITEM | QTY | DWG./PART No. | DESCRIPTION | | |
| | | | | | |

NOTE: THIS DRAWING ILLUSTRATES THE ANTICIPATED CONDITIONS FOLLOWING THE INSTALLATION OF RF-2

| | | | | | | | |
|------------------------------|--|---|--|---|-------|-----------------|---------|
| REV. DATE | | REVISION DESCRIPTION | | DRAWN | CHK'D | ENG'R | MR. |
| CUSTOMER | | W.C.A.I. | |  WESTATES CARBON, INC A WHEELABRATOR TECHNOLOGIES CO. LOS ANGELES, CA 90040 | | | |
| LOCATION | | PARKER ARIZONA | | TITLE SITE PLAN CARBON REACTIVATION FACILITY | | | |
| TOLERANCES EXCEPT AS NOTED - | | SCALE: NONE | | DRAWN | OPC | 6-16-84 | |
| DEC. ± 0.25 | | THIS DRAWING IS THE PROPERTY OF WESTATES CARBON, INC. AND CANNOT BE REPRODUCED OR DELIVERED TO OTHERS WITHOUT THE EXPRESS WRITTEN PERMISSION OF WESTATES CARBON, INC. | | CHK'D | | | |
| FRACT. ± 1/4 | | DO NOT SCALE DRAWING | | ENG'R | | | |
| | | | | MR. | | | |
| | | | | CODE | CA | DWG # D14789-01 | REV. P5 |
| | | | | PROJECT # 11139 | | | |



WESTATES PHOTOS (9/19/95)



Photo #1: Health risk assessment sample storage area, southwest corner of the container storage area.



Photo #2: Close up of the health risk assessment sample storage area.

WESTATES PHOTOS (9-19-95)

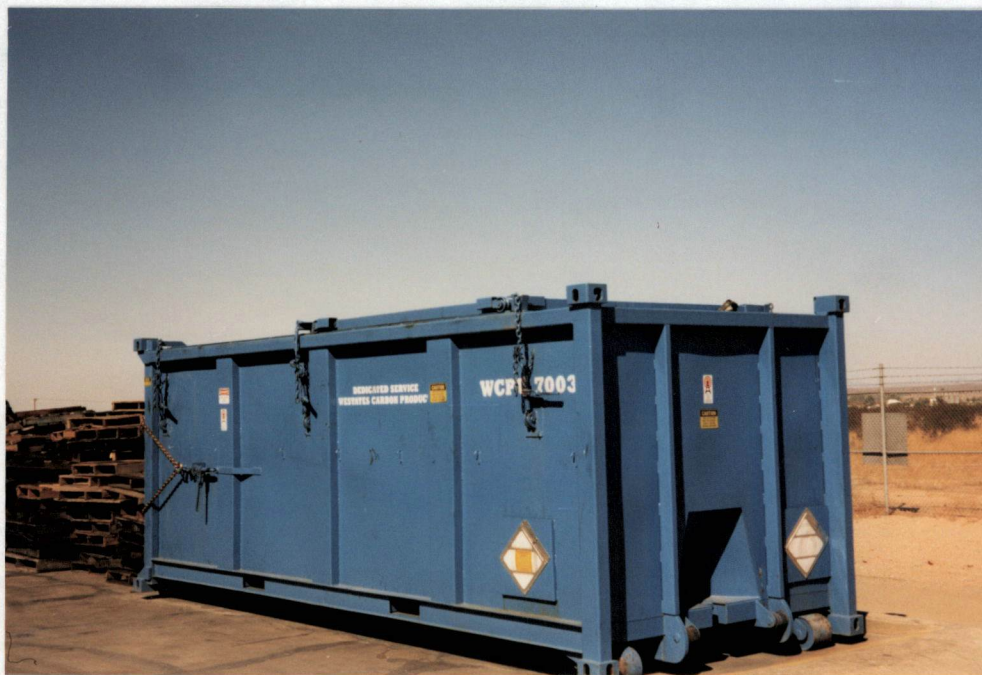


Photo #3: Dumpster in northeast corner of loading dock, for disposal of hazardous debris generated on site.